

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

GARY SPANO, *et al.*,

Plaintiffs,

vs.

No. 06-cv-743-NJR-DGW

THE BOEING COMPANY, *et al.*,

Defendants.

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND CASE CONTRIBUTION AWARDS FOR NAMED PLAINTIFFS**

Pursuant to Rules 23(h) and 54(d)(2), Plaintiffs move that the Court approve a fee award of \$19,000,000 and a cost award of \$1,821,470.38 to Class Counsel, Schlichter, Bogard & Denton; incentive awards of \$25,000 to three Named Plaintiffs and Class Representatives: Gary Spano, John Bunk, and Marlene White; and an incentive award of \$10,000 to two Named Plaintiffs and Class Representatives Kenneth Griffin and Douglas Peterman. As shown in Plaintiffs' supporting memorandum, in pursuing this case, Class Counsel devoted massive resources and bore tremendous risk in order to benefit the Class— advancing large sums and working without compensation throughout over nine years of hard-fought litigation, despite the prospect of possible non-payment for those expenses and 21,986 hours of attorney time. The requested percentage of the settlement fund is comparable to attorney's fees awards in similar cases.

Accordingly, based on all of the relevant factors, and for the reasons stated in Plaintiffs' memorandum, the Court should grant this motion in all respects.

Dated: January 29, 2016

Respectfully submitted,

/s/ Jerome J. Schlichter

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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2016, I served this document on all parties via the Court's CM/ECF system.

/s/ Jerome J. Schlichter